

ESTTA Tracking number: **ESTTA586049**

Filing date: **02/06/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210103
Party	Plaintiff The Coca-Cola Company
Correspondence Address	CYNTHIA PARKS PARKS IP LAW 730 PEACHTREE STREET NE, SUITE 600 ATLANTA, GA 30308 UNITED STATES tmdocketing@parksiplaw.com, cparks@parksiplaw.com, vkeenan@coca-cola.com
Submission	Motion to Amend Pleading/Amended Pleading
Filer's Name	Cynthia R. Parks
Filer's e-mail	cparks@parksiplaw.com, tmdocketing@parksiplaw.com, vthomas@parksiplaw.com, kherrick@parksiplaw.com, dalper@parksiplaw.com
Signature	/Cynthia R. Parks/
Date	02/06/2014
Attachments	Opposer's Motion to Amend Complaint - COKI COLA HAPPY MOTION.pdf(131741 bytes) Amended Notice of Opposition - COKI COLA HAPPY MOTION.pdf(538597 bytes) Redlined - Amended Notice of Opposition for COKI COLA HAPPY MOTION.pdf(663095 bytes) Certificate of Service - COKI COLA HAPPY MOTION.pdf(28225 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re: Application No. 85/672,347
Mark: COKI COLA HAPPY MOTION
Filed: July 10, 2012
Published: December 18, 2012

THE COCA-COLA COMPANY

Opposer,

v.

ALBERTO SOLER, DBA COKI LOCO

and

MIRIAM SOLER

Applicants.

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OPPOSER'S MOTION TO AMEND COMPLAINT

Opposer The Coca-Cola Company ("Opposer"), by and through its undersigned counsel and in accordance with Rule 2.127 of the Trademark Rules of Practice, files this Motion to Amend Complaint (the "MTA"), with the attached Amended Notice of Opposition, in response to the Board's ruling dated February 3, 2014 (the "Ruling"). In the Ruling, the Board indicated that if Opposer remains interested in amending its complaint to assert claims of fraud and false suggestion of a connection, its recourse is to file a motion to amend pursuant to Fed. R. Civ. P. 15, accompanied by an amended complaint that complies with Trademark Rule 2.104 and asserts Opposer's standing and each of its claims of relief. Ruling at 6. Accordingly, Opposer is submitting the MTA

and respectfully requests that the claim of fraud be added to its original complaint, as indicated in the attached Amended Notice of Opposition. Opposer is submitting the Amended Notice of Opposition in red-lined form as well as clean form, as recommended. TMBP §507.01.

REQUEST FOR LEAVE TO AMEND COMPLAINT

According to Fed. R. Civ. P. 15(a)(2), if the amended complaint is filed after 21 days from the serving of the original complaint and not within 21 days after service of a responsive pleading, “a party may amend its pleading only with the opposing party’s written consent or the court’s leave,” and “The court should freely give leave when justice so requires.” TMBP, §507.01. Opposer respectfully requests leave of the Board to amend its Notice of Opposition, as such leave would serve the interest of justice.

The Rules note that “the Board liberally grants leave to amend pleadings at any stage of a proceeding when justice so requires, unless entry of the proposed amendment would violate settled law or be prejudicial to the rights of the adverse party or parties.” TMBP §507.02. The Rules further specify that this leave should be given “even when a plaintiff seeks to amend its complaint to plead a claim other than those stated in the original complaint.” *Id.* In the attached Amended Notice of Opposition, Opposer seeks to respond to issues raised by the Board in a previous ruling and to modify its earlier response as indicated by the Board. Accordingly, Opposer submits that the interests of justice would be served by granting the Opposer leave to file the Amended Notice of Opposition.

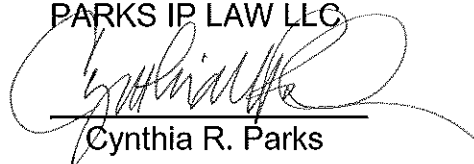
Finally, the Applicants have yet to file an Answer in the subject Opposition, and therefore, the allowance of an amended complaint at this time would not be prejudicial

to Applicants' rights. While the TBMP states that "a long and unexplained delay in filing a motion to amend a pleading...may render the amendment untimely" (§507.02(a)), in the matter at hand Opposer had filed a previous response and the proceedings had been suspended pending the resolution of several motions filed by Applicants. The attached Amended Notice of Opposition was previously submitted in the form of a brief, and therefore Applicants have been fully aware of the bases for the Amended Notice of Opposition since that date. Opposer has been responsive at all stages of these proceedings and has not attempted to delay or prejudice Applicants.

CONCLUSION

Therefore, Opposer respectfully requests leave from the Board to file the attached Amended Notice of Opposition.

Respectfully submitted this 6th day of February, 2014.

PARKS IP LAW LLC

Cynthia R. Parks

730 Peachtree Street NE
Suite 600
Atlanta, Georgia 30308
Phone: 678-365-4444
Fax: 678-365-4450

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re: Application No. 85/672,347
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THE COCA-COLA COMPANY

Opposer,

v.

MIRIAM SOLER

and

ALBERTO SOLER, DBA COKI LOCO

Applicants.

Opposition No. 91210103

AMENDED NOTICE OF OPPOSITION

THE COCA-COLA COMPANY ("TCCC," or "Opposer"), a Delaware corporation having its principal place of business at One Coca-Cola Plaza, Atlanta Georgia 30313, believes that it would be damaged by registration of the mark COKI COLA HAPPY MOTION ("Applicant's Mark") for:

"Entertainment in the nature of an on-going special variety, news, music or comedy show featuring Fictional Character named Coki Loco broadcast over television, satellite, audio, and video media; Entertainment services, namely, providing a website at which the general public can receive advice from an individual or entity concerning happiness, such advice being for entertainment purposes only; Entertainment services, namely, providing a website featuring games and puzzles; Entertainment services, namely, providing an on-line computer game; Entertainment services, namely, providing online computer games that help maintain an active brain and thus improve memory, speed of processing, and that provide a variety of cognitive benefits that positively impact quality of life; Entertainment services, namely, providing online video games; Providing a


website featuring information in the field of music and entertainment; Providing a website featuring information in the fields of education and entertainment for children; Providing a website featuring information on exercise and fitness; Providing a website featuring non-downloadable videos, namely, video presentations of a comedic nature; Providing a website featuring online sports training and training advice and the recording of training and workouts; Providing an interactive website featuring information and links relating to fitness; Providing an Internet website portal in the field of music”


in International Class 41, which mark is the subject of application Serial No. 85/672,347 (the “Application”), filed on July 10, 2012 by Miriam Soler as an individual and Alberto Soler, doing business as Coki Loco (both collectively referred to herein as “Applicant”), and published for opposition in the Official Gazette on December 18, 2012. By and through its undersigned attorney, TCCC hereby opposes the Application.

The grounds for this Opposition are as follows:

1. Opposer is the world’s largest beverage company, serving more than 1.6 billion consumers each day, in more than 200 countries around the world. Opposer’s COCA-COLA, COKE and DIET COKE brands are cornerstones of its portfolio, which presently includes fifteen billion dollar brands. COCA-COLA and DIET COKE are the top two soft drink brands in the world.

2. Opposer is the owner of numerous federal registrations and pending applications for its COCA-COLA and COKE family of trademarks (collectively, the “COCA-COLA Marks”), including:

Trademark		Registration Date	Goods
	Reg. No. 238,146 Incontestable	January 31, 1927	Class 32 Beverages and syrups for the manufacture of such beverages

Trademark		Registration Date	Goods
COCA-COLA	Reg. No. 238,145 <i>Incontestable</i>	January 31, 1928	Class 32 <i>Beverages and syrups for the manufacture of such beverages</i>
Coke	Reg. No. 415,755 <i>Incontestable</i>	August 14, 1945	Class 32 <i>Non-alcoholic maltless beverages and the syrups for making such beverages</i>
diet Coke	Reg. No. 1,260,160 <i>Incontestable</i>	December 6, 1983	Class 32 <i>Soft Drinks</i>
	Reg. No. 1,432,152 <i>Incontestable</i>	December 16, 1986	Class 32 <i>Soft drinks</i>
COKE CLASSIC	Reg. No. 1,824,556 <i>Incontestable</i>	March 1, 1994	Class 32 <i>Soft drinks and syrups and concentrates for making the same.</i>
VANILLA COKE	Reg. No. 2,757,341 <i>Incontestable</i>	December 31, 2002	Class 32 <i>Non-alcoholic beverages, namely, soft drinks</i>
COKE	Reg. No. 3,347,889 <i>Incontestable</i>	December 4, 2007	Class 32 <i>Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.</i>
CHERRY COKE	Reg. No. 3,434,466	March 11, 2008	Class 32 <i>Non-alcoholic beverages, namely, soft drinks; concentrate for making non-alcoholic beverages, namely, soft drinks.</i>

Trademark		Registration Date	Goods
DIET COKE PLUS	Reg. No. 3,490,468	August 19, 2008	Class 32 <i>Non-alcoholic beverages, namely, carbonated soft drinks; syrups and concentrates for making beverages, namely, carbonated soft drinks.</i>
DIET COKE	Reg. No. 3,820,750	July 20, 2010	Class 32 <i>Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.</i>
COCA-COLA FAN LOT	Reg. No. 2,607,376	August 13, 2002	Class 32 <i>Soft drinks, syrups and concentrates for use in the preparation of soft drinks</i> Class 41 <i>Entertainment services in the nature of interactive area at baseball stadiums, namely a structure composed of wood beams, climbing areas and slides; Entertainment in the nature of a youth baseball theme park featuring miniature baseball fields on which children can hit, run and catch baseballs; and entertainment services, namely, providing static exhibits of embossed signatures of famous baseball players that can be rubbed to create autographs.</i>
COCA-COLA SCREEN PLAY	Reg. No. 2,150,823	April 14, 1998	Class 41 <i>Entertainment services in the nature of film trivia slides displayed on-screen in movie theaters.</i>

All of these filings are valid and subsisting, in full force and effect, and are conclusive evidence of Opposer's exclusive right to use the COCA-COLA Marks for the goods and services referenced therein as well as for related goods and services.

3. Opposer has used the COCA-COLA Marks continuously in interstate commerce, and is and has been at all pertinent times the owner of all right, title and interest in and to the COCA-COLA Marks for a wide range of goods and services, including entertainment services in Class 41.

4. Opposer has invested a substantial amount of time, effort and money to promote its products and services offered under the COCA-COLA Marks, as well as to promote its corporate identity. In fact, Opposer spends hundreds of millions of dollars each year on measured media in connection with the COCA-COLA Marks, along with millions more on other media touchpoints, such as sponsorships, product placement, premiums, and coupons.

5. Accordingly, consumers exclusively associate Opposer's COCA-COLA Marks with Opposer, and the COCA-COLA Marks have established good will and enjoy fame of incalculable value in the U.S. and throughout the world.

FIRST BASIS FOR OPPOSITION – OWNERSHIP OF PRIOR REGISTRATIONS

6. The Application is based on the Applicant's purported intent to use Applicant's Mark, and therefore, the Application claims no date of first use.

7. Upon information and belief, Applicant is unable to establish priority of use of Applicant's Mark with respect to Opposer's COCA-COLA Marks.

8. Opposer has clear priority, given the longstanding use and registrations of the COCA-COLA Marks.

SECOND BASIS FOR OPPOSITION – LIKELIHOOD OF CONFUSION

9. Opposer would be damaged by registration of Applicant's Mark because Applicant's Mark is confusingly similar in appearance, sound and meaning to the COCA-COLA Marks, which the public exclusively associates with Opposer. Specifically, the "COKI" term in Applicant's Mark is nearly identical in sight, sound, and meaning to the Opposer's famous COKE marks, and the "COKI COLA" combination is nearly identical to the COCA-COLA portion of the COCA-COLA Marks. Given that Applicant's services make reference to a character named "Coki Loco" and not "Coki Cola," it appears likely that the COLA term was incorporated into Applicant's Mark primarily to cause confusion with Opposer's famous COCA-COLA Marks.

10. The similarities between Applicant's Mark and the COCA-COLA Marks, in conjunction with Applicant's intent to use its Mark in connection with entertainment services substantially related to those that Opposer offers under its COCA-COLA Marks, is likely to cause confusion, or to cause mistake, or to deceive with respect to the source or origin of Applicant's services, and is likely to cause consumers to believe Opposer sponsors or is affiliated with the Applicant. Such confusion would irreparably harm Opposer, particularly because Opposer has no control over the nature or quality of the services provided or produced by Applicant under Applicant's Mark. Opposer takes extensive measures to ensure the quality of any goods and services offered under its COCA-COLA Marks, and it would suffer irreparable harm if Applicant is allowed to offer the proposed services under Applicant's Mark without any quality control by Opposer.

11. Upon information and belief, the services that Applicant intends to offer under the COKI COLA HAPPY MOTION mark and those offered by the Opposer under certain of the COCA-COLA Marks are closely related, are or may be offered through the same, substantially the same, and/or related channels of distribution, and to the same, substantially the same, and/or related classes of purchasers; and are or may be advertised, marketed and promoted through the same media channels. The Company's prior-filed and registered marks COCA-COLA FAN LOT and COCA-COLA SCREENPLAY are a representative examples of its COCA-COLA Marks covering related entertainment services. The risk of confusion with Opposer's famous COCA-COLA Marks is especially high given that Applicant appears to be aiming its services at an audience of young children, who would be impressionable, unsophisticated consumers.

THIRD BASIS FOR OPPOSITION – DILUTION

12. The COCA-COLA Marks are famous marks within the meaning of Section 43(c) of the Lanham Act, and became famous long before the date of the application to register Applicant's Mark. The use by Applicant of Applicant's Mark for Applicant's proposed services would be likely to cause dilution, by blurring the distinctive quality of Opposer's famous COCA-COLA Marks, by tarnishing the reputation of Opposer's famous COCA-COLA Marks, or both.

FOURTH BASIS FOR OPPOSITION - FRAUD

13. Upon information and belief, the Application is related to at least one other pending application for a trademark that also infringes Opposer's rights in and to the COCA-COLA Marks, namely trademark application Serial No. 85/607,106 for the term COLA DE COKI. Accordingly, Opposer has reason to believe that Applicant has

intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications for COKI formative marks all filed by entities that appear to have misrepresented the nature of their relationship to one another.

14. Opposer has reason to believe that Applicant has intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications all filed by entities that appear to have misrepresented the nature of their relationship to one another, including Ser. No. 85/619,035 for COKI, 85/813,590 for UR COCA COLA, 85/738,874 for DKO, 85/097,54 for COCALEAF, 85/607,106 for COLA DE COKI, 85/756,565 for COCA-LISCIOUS, 85/756,528 for COCA, 85/095,398 for COCA LEAF WATER, and 85/741,161 for DOKE. Opposer believes, based upon communications with Applicant Alberto Soler, that this pattern of behavior by Applicant is no mere false or accidental misunderstanding but is rather a pattern of materially false statements made with the intent to deceive the Patent and Trademark Office.

15. Based upon communications with Applicant Alberto Soler, it appears that Applicant Miriam Soler does not have any true connection to the subject application, and her inclusion in the application was part of a scheme by Alberto Soler intended to defraud the PTO. Accordingly, it appears that Applicant Alberto Soler has knowingly made several false, material representations with regard to the ownership of this application and others with the intent to deceive the PTO.

16. Applicant Alberto Soler has also indicated in communications with Opposer's counsel that he purposefully filed the cited applications under different names in order to circumvent what he believed to be a legal restriction on U.S. trademark ownership based upon his Cuban citizenship.

FIFTH BASIS FOR OPPOSITION – LACK OF BONA FIDE INTENT TO USE

17. Upon information and belief, and in view of the forgoing, Applicant lacks a bona fide intent to use Applicant's Mark. In particular, intentional selection of an infringing mark and misidentification of the true owner(s) of the present application belies Applicant's claim that Applicant has any real and legitimate stake in acquiring a registration.


CONCLUSION

18. For at least the forgoing reasons, Opposer will be damaged by Applicant's registration of Applicant's Mark.

WHEREFORE, Opposer respectfully requests that this Opposition be sustained and that the Application for registration by Applicant be refused.

Respectfully submitted this 6th day of February, 2014.

PARKS IP LAW LLC



Cynthia R. Parks

730 Peachtree Street NE
Suite 600
Atlanta, Georgia 30308
Phone: 678-365-4444
Fax: 678-365-4450

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~~website featuring information in the field of music and entertainment; Providing a website featuring information in the fields of education and entertainment for children; Providing a website featuring information on exercise and fitness; Providing a website featuring non-downloadable videos, namely, video presentations of a comedic nature; Providing a website featuring online sports training and training advice and the recording of training and workouts; Providing an interactive website featuring information and links relating to fitness to fitness; Providing an Internet website portal in the field of music"~~

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in International Class 41, which mark is the subject of application Serial No. 85/672,347-347* (the "Application"), filed on July 10, 2012 by Miriam Soler as an individual and Alberto Soler, doing business as Coki Loco (both collectively referred to herein as "Applicant"), and published for opposition in the Official Gazette on December 18, 2012. By and through its undersigned attorney, TCCC hereby opposes the Application.

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1. Opposer is the ~~world's~~ world's largest beverage company, serving more than 1.6 billion consumers each day, in more than 200 countries around the world. ~~Opposer's~~ Opposer's COCA-COLA, COKE and DIET COKE brands are cornerstones of its portfolio, which presently includes fifteen billion dollar brands. COCA-COLA and DIET COKE are the top two soft drink brands in the world.


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Trademark		Registration Date	Goods
COCA-COLA	Reg. No. 238,145	January 31, 1928	Class 32
<u>Trademark</u>	<u>Registration Date</u>	<u>Goods</u>	
	Reg. No. 238,146 <u>Incontestable</u>	January 31, 1927	Class 32 <u>Beverages and syrups for the manufacture of such beverages</u>
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	Reg. No. 415,755 <u>Incontestable</u>	August 14, 1945	August 14, 1945 on Class 32 <u>Non-alcoholic malt beverages and the syrups for making such beverages</u>
	Reg. No. 1,260,160 <u>Incontestable</u>	December 6, 1983	December 6, 1983 Class 32 <u>Soft Drinks</u>
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COKE CLASSIC	Reg. No. 1,824,556	March 1, 1994	March 1, 1994 Class 32
	Incontestable		Soft drinks and syrups and concentrates for making the same.
VANILLA COKE	Reg. No. 2,757,341	December 31, 2002	Class 32
	Incontestable		Non-alcoholic beverages, namely, soft drinks
VANILLA COKE	Reg. No. 2,757,341, 3,347,889	December 21, 2002, 2007	Class 32
	Incontestable		Non-alcoholic beverages, namely, soft drinks
COKE	Reg. No. 3,347,889	December 4, 2007	
	Incontestable		Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
CHERRY COKE	Reg. No. 3,434,466	March 11, 2008	March 11, 2008 Class 32
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<u>Trademark</u>	<u>Registration Date</u>	<u>Goods</u>
<u>DIET COKE PLUS</u>	<u>Reg. No. 3,490,468</u>	<u>August 19, 2008</u>
		Class 32 <i>Non-alcoholic beverages, namely, carbonated soft drinks; syrups and concentrates for making beverages, namely, carbonated soft drinks.</i>
<u>DIET COKE</u>	<u>Reg. No. 3,820,750</u>	<u>July 20, 2010</u>
		Class 32 <i>Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.</i>
<u>COCA-COLA FAN LOT</u>	<u>Reg. No. 2,607,376</u>	<u>August 13, 2002</u>
		Class 32 <i>Soft drinks, syrups and concentrates for use in the preparation of soft drinks</i> Class 41 <i>Entertainment services in the nature of interactive area at baseball stadiums, namely a structure composed of wood beams, climbing areas and slides; Entertainment in the nature of a youth baseball theme park featuring miniature baseball fields on which children can hit, run and catch baseballs; and entertainment services, namely, providing static exhibits of embossed signatures of famous baseball players that can be rubbed to create autographs.</i>
<u>COCA-COLA SCREEN PLAY</u>	<u>Reg. No. 2,150,823</u>	<u>April 14, 1998</u>
		Class 41 <i>Entertainment services in the nature of film trivia slides displayed on-screen in movie theaters.</i>

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App. Ser. No. 85/494,701

DIET COKE PLUS	Reg. No. 2,400,468	August 10, 2008	Class 32
Trademark		Registration Date	Goods
	COCA-COLA MOVE TO THE BEAT		Non-alcoholic beverages, namely, carbonated soft drinks; syrups and concentrates for making beverages, namely, carbonated soft drinks.
DIET COKE	Reg. No. 3,820,759	July 20, 2010	Class 32 Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
COCA-COLA FAN LOT	Reg. No. 2,607,376	August 13, 2002	Class 32 Soft drinks, syrups and concentrates for use in the preparation of soft drinks
			Class 41 Entertainment services in the nature of interactive area at baseball stadiums, namely a structure composed of wooden beams, climbing areas and slides; Entertainment in the nature of a youth baseball theme park featuring miniature baseball fields on which children can hit, run and catch baseballs; and entertainment services, namely, providing static exhibits of embossed signatures of famous baseball players that can be rubbed to create autographs.
COCA-COLA SCREEN PLAY	Reg. No. 2,150,823	April 14, 1998	Class 41 Entertainment services in the nature of film trivia slides displayed on screen in movie theaters.

Published
January Class
9
8, 2013

Digital media,
namely,
downloadable
pre-recorded
audio and video
recordings
featuring

musical performances

Class 41

Entertainment services, namely, providing live musical
performances; Entertainment services, namely, providing a
website featuring non-
downloadable, pre-recorded musical performances.

All of these filings are valid and subsisting, in full force and effect, and are conclusive evidence of Opposer's exclusive right to use the COCA-COLA Marks for the goods and services referenced therein as well as for related goods and services.

3. Opposer has used the COCA-COLA Marks continuously in interstate commerce, and is and has been at all pertinent times the owner of all right, title and interest in and to the COCA-COLA Marks for a wide range of goods and services, including entertainment services in Class 41.

4. Opposer has invested a substantial amount of time, effort and money to promote its products and services offered under the COCA-COLA Marks, as well as to promote its corporate identity. In fact, Opposer spends hundreds of millions of dollars each year on measured media in connection with the COCA-COLA Marks, along with millions more on other media touchpoints, such as sponsorships, product placement, premiums, and coupons.

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5. Accordingly, consumers exclusively associate ~~Opposer's~~ **Opposer's** COCA-COLA Marks with Opposer, and the COCA-COLA Marks have established good will and enjoy fame of incalculable value in the U.S. and throughout the world.

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FIRST BASIS FOR OPPOSITION -- OWNERSHIP OF PRIOR REGISTRATIONS

6. The Application is based on the ~~Applicant's~~ **Applicant's** purported intent to use ~~Applicant's~~ **Applicant's** Mark, and therefore, the Application claims no date of first use.

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7. Upon information and belief, Applicant is unable to establish priority of use of ~~Applicant's~~ **Applicant's** Mark with respect to ~~Opposer's~~ **Opposer's** COCA-COLA Marks.

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8. Opposer has clear priority, given the longstanding use and registrations of the COCA-COLA Marks.

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SECOND BASIS FOR OPPOSITION -- LIKELIHOOD OF CONFUSION

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9. Opposer would be damaged by registration of ~~Applicant's~~ **Applicant's** Mark because ~~Applicant's~~ **Applicant's** Mark is confusingly similar in appearance, sound and meaning to the COCA-COLA Marks, which the public exclusively associates with Opposer. Specifically, the "COKI" term in ~~Applicant's~~ **Applicant's** Mark is nearly identical in sight, sound, and meaning to the ~~Opposer's~~ **Opposer's** famous COKE marks, and the "COKI COLA" combination is nearly identical to the COCA-COLA portion of the COCA-COLA Marks. Given that ~~Applicant's~~ **Applicant's** services make reference to a character named "Coki Loco" and not "Coki Cola," it appears likely that the COLA term was incorporated

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into Applicant's Mark primarily to cause confusion with Opposer's famous COCA-COLA Marks.

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10. The similarities between Applicant's Mark and the COCA-COLA Marks, in conjunction with Applicant's intent to use its Mark in connection with entertainment

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10. services substantially related to those that Opposer offers under its COCA-COLA Marks, is likely to cause confusion, or to cause mistake, or to deceive with respect to the source or origin of Applicant's Applicant's services, and is likely to cause consumers to believe Opposer sponsors or is affiliated with the Applicant. Such confusion would irreparably harm Opposer, particularly because Opposer has no control over the nature or quality of the services provided or produced by Applicant under Applicant's Applicant's Mark. Opposer takes extensive measures to ensure the quality of any goods and services offered under its COCA-COLA Marks, and it would suffer irreparable harm if Applicant is allowed to offer the proposed services under Applicant's Applicant's Mark without any quality control by Opposer.

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11. Upon information and belief, the services that Applicant intends to offer under the COKI COLA HAPPY MOTION mark and those offered by the Opposer under certain of the COCA-COLA Marks are closely related, are or may be offered through the same, substantially the same, and/or related channels of distribution, and to the same, substantially the same, and/or related classes of purchasers; and are or may be advertised, marketed and promoted through the same media channels. The Company's Company's prior-filed and presently allowed application to register the mark registered marks COCA-COLA MOVE TO THE BEAT is FAN LOT and COCA-COLA SCREENPLAY are a representative example examples of its COCA-COLA Marks covering related entertainment services. The risk of confusion with Opposer's Opposer's famous COCA-COLA Marks is especially high given that Applicant appears to be aiming its services at an audience of young children, who would be impressionable, unsophisticated consumers.

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THIRD BASIS FOR OPPOSITION — DILUTION

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12. The COCA-COLA Marks are famous marks within the meaning of Section 43(c) of the Lanham Act, and became famous long before the date of the application to

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12. register Applicant's Applicant's Mark. The use by Applicant of Applicant's Applicant's Mark for Applicant's Applicant's proposed services would be likely to cause dilution, by blurring the distinctive quality of Opposer's Opposer's famous COCA-COLA Marks, by tarnishing the reputation of Opposer's Opposer's famous COCA-COLA Marks, or both.

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FOURTH BASIS FOR OPPOSITION - FRAUD

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13. Upon information and belief, the Application is related to at least one other pending application for a trademark that also infringes Opposer's Opposer's rights in and to the COCA-COLA Marks, namely trademark application Serial No. 85/607,106 for the term COLA DE COKI. Accordingly, Opposer has reason to believe that Applicant has intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Applicant's Mark. It has also come to Opposer's Opposer's attention that this pattern of fraud extends to an entire family of applications for COKI formative marks all filed by entities that appear to have misrepresented the nature of their relationship to one another.

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14. Opposer has reason to believe that Applicant has intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications all filed by entities that appear to have misrepresented the nature of their relationship to one another, including Ser. No. 85/619,035 for COKI, 85/813,590 for UR COCA COLA, 85/738,874 for DKO, 85/097,54 for COCALEAF, 85/607,106 for COLA DE COKI, 85/756,565 for COCA-LISCIOUS, 85/756,528 for COCA, 85/095,398 for COCA LEAF WATER, and 85/741,161 for DOKE. Opposer believes, based upon communications with Applicant Alberto Soler, that this pattern of behavior by Applicant is no mere false or accidental misunderstanding but is

rather a pattern of materially false statements made with the intent to deceive the Patent and Trademark Office.

15. Based upon communications with Applicant Alberto Soler, it appears that Applicant Miriam Soler does not have any true connection to the subject application, and her inclusion in the application was part of a scheme by Alberto Soler intended to defraud the PTO. Accordingly, it appears that Applicant Alberto Soler has knowingly made several false, material representations with regard to the ownership of this application and others with the intent to deceive the PTO.

16. Applicant Alberto Soler has also indicated in communications with Opposer's counsel that he purposefully filed the cited applications under different names in order to circumvent what he believed to be a legal restriction on U.S. trademark ownership based upon his Cuban citizenship.

FIFTH BASIS FOR OPPOSITION — LACK OF BONA FIDE INTENT TO USE

14-17. Upon information and belief, and in view of the forgoing, Applicant lacks a bona fide intent to use Applicant's Applicant's Mark. In particular, intentional selection of an infringing mark and misidentification of the true owner(s) of the present application belies Applicant's Applicant's claim that Applicant has any real and legitimate stake in acquiring a registration.

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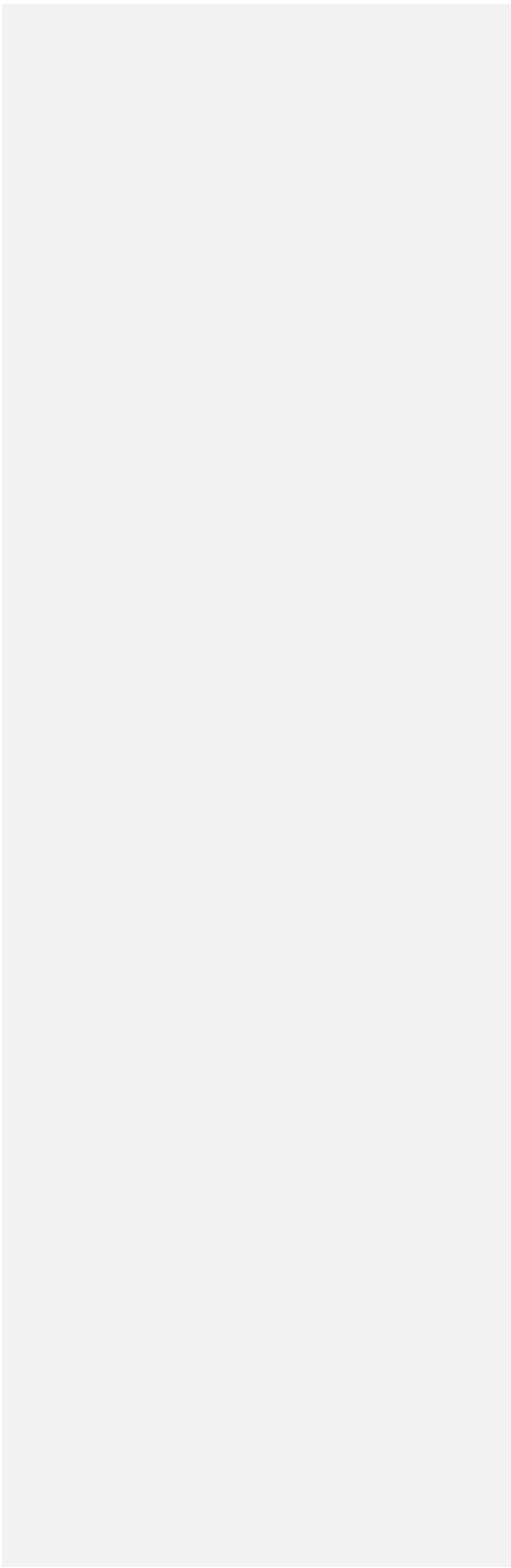
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CONCLUSION

15-18. For at least the forgoing reasons, Opposer will be damaged by Applicant's registration of Applicant's Mark.

WHEREFORE, Opposer respectfully requests that this Opposition be sustained and that the Application for registration by Applicant be refused.

Respectfully submitted, this 5th day of April, 2013 February, 2014.

PARKS, IP LAW, LLC

/s/

Cynthia R. Parks Cynthia R. Parks

730 Peachtree Street NE
Suite 600
Atlanta, Georgia 30308
Telephone Phone: 678-365-4444
Facsimile Fax: 678-365-4450

Attorney for Opposer
THE COCA-COLA COMPANY

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CERTIFICATE OF
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~~This is to certify, in accordance with Rule 2.101(b) of the~~

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~~Trademark Rules of Practice, that I have this day served the foregoing~~
~~Opposition of the Applicants, by causing a true and correct copy thereof to be deposited~~
~~in the United States Mail, postage prepaid, addressed to the attorney of record for the~~
~~Applicants as follows:~~

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~~Alberto Soler~~
~~OBA Coki Loco~~
~~7700 N. Kendall Drive~~
~~Suite 701~~
~~Miami, Florida 33156~~

~~Miriam Soler~~
~~4741 NW 5th Street~~
~~Miami, Florida 33126~~

~~Laudis Moreira~~
~~Domestic~~
~~Representative Banah~~
~~Sugar/UR COLA~~
~~215 SE 10th Avenue (Banah Sweetway)~~
~~Hialeah, Florida 33010~~
~~thenewkidontheb/ock@live.com~~

~~This 5th day of April, 2013.~~

~~/s/ Cynthia R. Parks~~ Cynthia R. Parks

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CERTIFICATE OF SERVICE

This is to certify, in accordance with Rule 2.101(b) of the Trademark Rules of Practice, that I have this day served the foregoing **Opposer's Motion to Amend Complaint and Amended Notice of Opposition** by electronic mail to the addresses of record and by causing a true and correct copy thereof to be deposited in the United States Mail, postage prepaid, addressed to the Applicants and/or their attorneys of record as follows:

Alberto Soler d/b/a Coki Loco and Miriam Soler
The Red Luna KO
Soler Law Firm
11003 NW 33 Street
Doral, FL 33172
solerlawfirm@att.net, redlunalaw@att.net

This 6th day of February, 2014.


Cynthia R. Parks